

Ashley M. Simonsen (State Bar. No. 275203)  
COVINGTON & BURLING LLP  
1999 Avenue of the Stars  
Los Angeles, CA 90067  
Telephone: + 1 (424) 332-4800  
Facsimile: +1 (650) 632-4800  
Email: asimonsen@cov.com

*Attorneys for Defendants Meta Platforms, Inc.;  
Instagram, LLC; Meta Payments, Inc.; and Meta  
Platforms Technologies, LLC*

*Additional Parties and counsel listed on signature  
pages*

UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA ADOLESCENT  
ADDICTION/PERSONAL INJURY PRODUCTS  
LIABILITY LITIGATION

This Document Relates To:  
  
ALL ACTIONS

MDL No. 3047

Case No. 4:22-md-03047-YGR (PHK)

**TEMPORARY SEALING MOTION  
(TRIAL SELECTION OF  
BELLWETHER PERSONAL INJURY  
CASES)**

Judge: Hon. Yvonne Gonzalez Rogers

Magistrate Judge: Hon. Peter H. Kang

Pursuant to the Court's Order Setting Sealing Procedures (ECF No. 341), the Parties file this Temporary Sealing Motion regarding the Bellwether Trial Selection Briefing. Pursuant to that Order, the reasons for sealing (if any) will be addressed in a forthcoming omnibus stipulation or omnibus motion.

<b>Docket No. / Exhibit</b>	<b>Document</b>	<b>Designating Party</b>
ECF 1966	Bellwether Trial Selection Brief (Sealed)	Plaintiffs
Ex. A	S.K. Eighth Am. PFS (Excerpted)	Plaintiffs
Ex. B	S.K. 1/28/2025 Dep. (Excerpted)	Plaintiffs
Ex. C	3/31/25 Kouba Email	Plaintiffs
Ex. D	5/19/25 Pls.' Resp. to Questions re Medical Records Update	Plaintiffs
Ex. E	4/4/25 G. Howell Email	Plaintiffs
Ex. F	4/22/25 Oliver Email	Plaintiffs
Ex. G	S.K. Suppl. Resp. to Defs' Rogs	Plaintiffs
Ex. H	158RHW-00294	Plaintiffs
Ex. I	1/16/25 Hr'g Tr. at 12-13 (Excerpted)	Plaintiffs
Ex. J	Rpt. of Dr. Murray (S.K.) (Excerpted)	Plaintiffs
Ex. K	Mullen Fifth Am. PFS (Excerpted)	Plaintiffs
Ex. L	67NKA-00015	Plaintiffs
Ex. M	N. Mullen Dep. (Excerpted)	Plaintiffs
Ex. N	S.D. Dep. (Excerpted)	Plaintiffs
Ex. O	S.D. Dep. Ex. 3	Plaintiffs
Ex. P	PLTF_MULLEN_00100459-488	Plaintiffs
Ex. Q	N. Mullen Dep. Ex. 3	Plaintiffs
Ex. R	N. Mullen Dep. Ex. 7	Plaintiffs
Ex. S	PLTF_MULLEN_00106899	Plaintiffs
Ex. T	PLTF_MULLEN_00106917	Plaintiffs
Ex. U	Clevenger Seventh Am. PFS (Excerpted)	Plaintiffs
Ex. V	L. Clevenger Dep. (Excerpted)	Plaintiffs
Ex. W	Craig Fourth Am. PFS (Excerpted)	Plaintiffs
Ex. X	J.D. Third Am. PFS (Excerpted)	Plaintiffs
Ex. Y	J.D. Dep. (Excerpted)	Plaintiffs
Ex. Z	B.S. Dep. (Excerpted)	Plaintiffs
Ex. AA	Melton Third Am. PFS (Excerpted)	Plaintiffs
Ex. BB	D. Melton Dep. (Excerpted)	Plaintiffs
Ex. CC	Smith Fourth Am. PFS (Excerpted)	Plaintiffs
Ex. DD	L. Smith Dep. (Excerpted)	Plaintiffs
Ex. EE	J. Smith Dep. (Excerpted)	Plaintiffs
Ex. FF	D'Orazio Second Am. PFS (Excerpted)	Plaintiffs
Ex. GG	J. D'Orazio Dep. (Excerpted)	Plaintiffs
Ex. HH	Transcript of JCCP Hearing (Excerpted)	Plaintiffs

1 DATED: May 23, 2025

Respectfully submitted,

2  
3 COVINGTON & BURLING LLP

4 By: /s/ Ashley M. Simonsen  
Ashley M. Simonsen  
1999 Avenue of the Stars  
Los Angeles, CA 90067  
Telephone: (424) 332-4800  
Facsimile: + 1 (424) 332-4749  
Email: asimonsen@cov.com

8 COVINGTON & BURLING LLP  
9 Phyllis A. Jones, Admitted *pro hac vice*  
10 Paul W. Schmidt, Admitted *pro hac vice*  
One City Center  
850 Tenth Street, NW  
Washington, DC 20001-4956  
Telephone: + 1 (202) 662-6000  
Facsimile: + 1 (202) 662-6291  
Email: pajones@cov.com

14 *Attorney for Defendants Meta Platforms, Inc.*  
15 *f/k/a Facebook, Inc.; Facebook Holdings,*  
16 *LLC; Facebook Operations, LLC; Facebook*  
17 *Payments, Inc.; Facebook Technologies, LLC;*  
*Instagram, LLC; Siculus, Inc.; and Mark Elliot*  
*Zuckerberg*

18 FAEGRE DRINKER LLP

19 By: /s/ Jori M. Loren  
20 Nicholas J. Begakis (Bar No. 253588)  
Faegre Drinker Biddle and Reath LLP  
1800 Century Park East, Suite 1500  
Los Angeles, CA 90067  
Telephone: (310) 203-4000  
Facsimile: (310) 229-1285  
Email: nicholas.begakis@faegredrinker.com

24 FAEGRE DRINKER LLP  
25 Jori M. Loren Admitted *pro hac vice*  
26 320 South Canal Street, Suite 3300  
Chicago, IL 60606  
27 Telephone: +1 (312) 356-5116  
Facsimile: +1 (312) 569-3000  
28 Email: amy.fiterman@faegredrinker.com

1  
2 KING & SPALDING LLP  
3 Geoffrey Drake, Admitted *pro hac vice*  
4 1180 Peachtree Street, NE, Suite 1600  
5 Atlanta, GA 30309  
6 Tel.: 404-572-4600  
7 Email: gdrake@kslaw.com  
8 Email: dmattern@kslaw.com

9 KING & SPALDING LLP  
10 David Mattern, Admitted *pro hac vice*  
11 1700 Pennsylvania Avenue, NW, Suite 900  
12 Washington, D.C. 20006  
13 Telephone: +1 (202) 626-2946  
14 Email: dmattern@kslaw.com

15 *Attorneys for Defendants TikTok Inc. and ByteDance*  
16 *Inc.*

17 MUNGER, TOLLES & OLSON LLP  
18 By: /s/ Jonathan H. Blavin  
19 Jonathan H. Blavin, SBN 230269  
20 MUNGER, TOLLES & OLSON LLP  
21 560 Mission Street, 27th Floor  
22 San Francisco, CA 94105-3089  
23 Telephone: (415) 512-4000  
24 Facsimile: (415) 512-4077  
25 Email: jonathan.blavin@mto.com

26 Rose L. Ehler (SBN 29652)  
27 Victoria A. Degtyareva (SBN 284199)  
28 Laura M. Lopez, (SBN 313450)  
Ariel T. Teshuva (SBN 324238)  
MUNGER, TOLLES & OLSON LLP  
350 South Grand Avenue, 50th Floor  
Los Angeles, CA 90071-3426  
Telephone: (213) 683-9100  
Facsimile: (213) 687-3702  
Email: rose.ehler@mto.com  
Email: victoria.degtyareva@mto.com  
Email: Ariel.Teshuva@mto.com

*Attorneys for Defendant Snap Inc.*

WILSON SONSINI GOODRICH & ROSATI  
Professional Corporation  
By: /s/ Brian M. Willen  
Brian M. Willen (*pro hac vice*)

1 WILSON SONSINI GOODRICH & ROSATI  
2 1301 Avenue of the Americas, 40th Floor  
3 New York, New York 10019  
4 Telephone: (212) 999-5800  
5 Facsimile: (212) 999-5899  
6 Email: bwillen@wsgr.com

7 Lauren Gallo White (SBN 309075)  
8 Samantha A. Machock (SBN 298852)  
9 WILSON SONSINI GOODRICH & ROSATI  
10 One Market Plaza, Spear Tower, Suite 3300  
11 San Francisco, CA 94105  
12 Telephone: (415) 947-2000  
13 Facsimile: (415) 947-2099  
14 Email: lwhite@wsgr.com  
15 Email: smachock@wsgr.com

16 Christopher Chiou (SBN 233587)  
17 Matthew K. Donohue (SBN 302144)  
18 WILSON SONSINI GOODRICH & ROSATI  
19 953 East Third Street, Suite 100  
20 Los Angeles, CA 90013  
21 Telephone: (323) 210-2900  
22 Facsimile: (866) 974-7329  
23 Email: cchiou@wsgr.com  
24 Email: mdonohue@wsgr.com

25 *Attorneys for Defendants YouTube, LLC and Google*  
26 *LLC*

27 WILLIAMS & CONNOLLY LLP  
28 By: /s/ Joseph G. Petrosinelli  
Joseph G. Petrosinelli (*pro hac vice*)  
jpetrosinelli@wc.com  
Ashley W. Hardin (*pro hac vice*)  
ahardin@wc.com  
680 Maine Avenue, SW  
Washington, DC 20024  
Telephone.: 202-434-5000  
Fax: 202-434-5029

*Attorneys for Defendants YouTube, LLC and Google*  
*LLC*

MORGAN, LEWIS & BOCKIUS LLP  
By: /s/ Yardena R. Zwang-Weissman  
Yardena R. Zwang-Weissman (SBN 247111)  
300 South Grand Avenue, 22nd Floor

1 Los Angeles, CA 90071-3132  
2 Tel.: 213.612.7238  
3 Email: yardena.zwang-weissman@morganlewis.com

4 Brian Ercole (*pro hac vice*)  
5 600 Brickell Avenue, Suite 1600  
6 Miami, FL 33131-3075  
7 Tel.: 305.415.3416  
8 Email: brian.ercole@morganlewis.com

9 Stephanie Schuster (*pro hac vice*)  
10 1111 Pennsylvania Avenue NW  
11 NW Washington, DC 20004-2541  
12 Tel.: 202.373.6595  
13 Email: stephanie.schuster@morganlewis.com  
14 *Attorneys for Defendants YouTube, LLC and Google*  
15 *LLC*  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**ATTESTATION**

I, Ashley M. Simonsen, hereby attest, pursuant to N.D. Cal. Civil L.R. 5-1, that the concurrence to the filing of this document has been obtained from each signatory hereto.

Dated: May 23, 2025

By: /s/ Ashley M. Simonsen

Ashley M. Simonsen